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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

May 26, 1993

Federal Communications Commission  
Washington, D.C. 20554

Attn : Ralph Haller, Chief  
Private Radio Bureau

**COMMENTS ON FCC NOTICE OF PROPOSED RULES - REVISION OF THE PLMR  
SERVICES AND THEIR GOVERNING POLICIES, DOCKET NO. 92-235**

The City of Los Angeles (City) submits these comments in response to the Commission's Notice of Proposed Rule Making on spectrum efficiency in the use of the bands below 512 MHz allocated to the private land mobile radio (PLMR) services.

**Spectrum Efficiency Standards:**

The City supports the standards that will provide greater spectrum efficiency. These standards must reflect the current state of the art technologies such as Frequency Division, Time Division and Code Division Multiplexing Access (FDMA, TDMA and CDMA) and other narrow band technologies. The cost of acquiring the new equipment and the cost of reconfiguring the users' existing VHF and UHF networks have to be considered in the choice of new standards.

The City requests to modify the deadline for migrating to the 12.5 kHz narrowband channels from January 1, 1996 to January 1, 2004, and revisit the migration to 6.25 kHz narrowband channels when the technology is available for consideration.

**Channel Exclusivity Option In The Bands Above 150 MHz:**

The City endorses the Channel Exclusivity Use Overlay (EUO) plan. However, it is recommended that this concept be applied only to a dedicated frequency pooling of Public Safety services. The City believes that the exclusive pooling of Public Safety will protect the users from the other PLMR users e.g. Commercials.

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### **Consolidation Of The Current 19 Radio Services:**

The City supports the consolidation of the radio services into three broad categories; Public Safety, Non-Commercial, and Specialized Mobile Radio. However, the City recommends that Public Safety be allocated its own General Category pool to protect the Public Safety frequencies from other PLMR services.

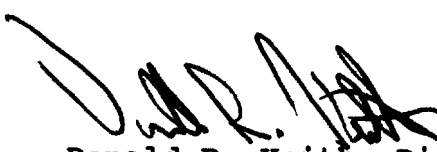
### **New Technical And Operational Standards:**

The City agrees that proposed standards in regards to reduced Effective Radiated Power (ERP) and Height Above Average Terrain (HAAT) would provide improved spectrum reuse.

The City supports rule changes that will require systems to be designed to provide coverage for only the jurisdiction it serves as mandated by the 800 MHz Regional Communications Plan, Region 5 (pursuant to docket #87-112). In this case sites with high power and HAAT may be justifiable to provide the coverage for the user's jurisdiction as long as the coverage is contained within the jurisdiction.

### **CONCLUSION**

The City of Los Angeles concurs with the purposes and objectives of the FCC proposal. Nevertheless, rules that will be adopted have to be examined closely for their technical and economical merits when mandated by FCC. These rules have to be formulated in such a manner that when they are implemented will allow Public Safety flexibility to satisfy its current and future needs with minimal financial expenditures.



Donald R. Keith, Director  
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Department of General Services